

SULLIVAN HILL REZ & ENGEL  
A Professional Law Corporation  
James P. Hill, SBN 90478  
Christopher V. Hawkins, SBN 222961  
600 B Street, Suite 1700  
San Diego, California 92101  
Tel: (619) 233-4100  
Email: hill@sullivanhill.com  
hawkins@sullivanhill.com

Gerald Singleton, SBN 208783  
John C. Lemon, SBN 175847  
SINGLETON LAW FIRM, APC  
450 A Street, 5<sup>th</sup> Floor  
San Diego, CA 92101  
Tel: (619) 771-3473  
Email: gerald@slffirm.com  
john@jcl-lawoffice.com

Attorneys for SLF Fire Victim Claimants

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re	)	Case No. 19-30088 (DM)
	)	
PG&E CORPORATION,	)	Chapter 11
	)	
and	)	(Lead Case–Jointly Administered)
	)	
PACIFIC GAS AND ELECTRIC	)	
COMPANY	)	<b>DECLARATION OF GERALD SINGLETON</b>
	)	<b>IN SUPPORT OF OBJECTION BY THE</b>
Debtors	)	<b>SINGLETON LAW FIRM FIRE VICTIM</b>
	)	<b>CLAIMANTS TO PG&amp;E’S EXCLUSIVITY</b>
	)	<b>MOTION (DOC. 1795)</b>

Affects:

☐ PG&E Corporation

☐ Pacific Gas & Electric Company

☒ Both Debtors

\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).

Date: May 22, 2019  
Time: 9:30 a.m. (Pacific)  
Place: United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102  
Hon. Dennis Montali

Opposition Deadline: May 15, 2019, 4 p.m. (PDT)

1 I, Gerald Singleton, state and declare as follows:

2 1. I am an attorney duly licensed to practice law in the states of California and Texas, the  
3 United States Supreme Court, the Ninth Circuit Court of Appeals, and all District Courts in the State  
4 of California. I am the senior partner of the Singleton Law Firm, APC, and am counsel for the SLF  
5 Fire Victim Claimants (“SLF Claimants”).

6 2. I make this declaration in support of the Objection by the Singleton Law Firm Fire  
7 Victim Claimants to PG&E’s Exclusivity Motion (“Objection”). All capitalized terms not otherwise  
8 defined herein shall have the meanings ascribed to them in the Objection. I have personal knowledge  
9 of the facts set forth in this declaration, and if called as a witness, I could and would testify  
10 competently to those facts.

11 3. Although the Singleton Law Firm represents over 4,700 victims, the PG&E  
12 bankruptcy attorneys have stated that they will speak only to counsel for the Tort Claims Committee  
13 and there has been no substantive communications with counsel for the SLF Fire Victim Claimants.

14 4. Because PG&E has refused to communicate substantively with counsel the SLF Fire  
15 Victim Claimants, there has made no progress in negotiations. However, based on communications  
16 with other lawyers in this proceeding, it appears that PG&E is trying to negotiate a matrix to facilitate  
17 mass settlements (akin to a class action) rather than settling claims on an individual basis.

18 5. Mass settlement is not in the best interest of the fire victims. The Singleton Firm has  
19 settled well over one thousand fire cases – including over 700 from the Butte Fire with PG&E – and  
20 is uniquely credentialed to appreciate that the fire victims must maintain the right to have their cases  
21 handled individually. Taking a one-size-fits-all approach and resolving these claims *en masse* would  
22 be a windfall to PG&E at the expense of these victims, who still deserve to be made whole –  
23 PG&E’s *elective* bankruptcy notwithstanding.

24 6. The Butte Fire occurred in 2015. The Singleton Firm still represents over 700  
25 individual victims (in more than 300 cases) who have been waiting since 2015 and who were on the  
26 cusp of being compensated for their losses when PG&E elected to declare bankruptcy.

27 7. As PG&E’s Chief Financial Officer admitted in his sworn testimony at the Creditor’s  
28 Hearing on April 29, even taking the worst current projections for its fire losses into account (\$30

1 billion in overall damages from the three fire complexes) PG&E will still have over \$6 billion more  
2 in assets than in liabilities. This was a tactical move designed to try and get a better deal for PG&E,  
3 and a worse deal for the fire victims, the ratepayers, and the public.

4 8. At the Creditor's Meeting on April 29, 2019, PG&E's CFO testified that he believed  
5 the lowest range of PG&E's liability would be \$14 billion, not \$13.4 billion. However, he  
6 acknowledged that, based on the information known to PG&E to date, \$30 billion was the high-end  
7 of the PG&E's estimates for the potential damages from these fires.

8 9. PG&E is leveraging its position as a massive debtor to influence the state government  
9 to enact legislation: (1) imposing limitations on fire liability for utilities; and (2) to create a bail-out  
10 fund. This is both unfair to the victims (who must now languish while their claims are in bankruptcy  
11 court), the taxpayers (who are being asked to pay billions of dollars for PG&E's malfeasance so that  
12 PG&E shareholders can continue to reap billions of dollars in profits and dividends) and an abuse of  
13 process.

14 10. I declare under penalty of perjury under the laws of the United States of America that  
15 the foregoing is true and correct. Executed on May 15, 2019, at San Diego, California.

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19 Gerald Singleton  
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